

Ackerman, Joyce

From: Thomas J. Krasovec <TJKrasovec@Geosyntec.com>
Sent: Friday, March 2, 2018 3:05 PM
To: Ackerman, Joyce; Stovall - CDPHE, Curtis; david.walker@state.co.us
Cc: Jonathan H. Steeler; 'Richard Dean'; Dave Folkes
Subject: Interim Closure Plan
Attachments: Interim Shut Down Plan - March 2 2018.pdf

Joyce,

Please find attached the interim closure plan for the Nuehauser Landfill site. Please let me know if you have any questions.

Thanks TJK

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INTERIM SHUT DOWN PLAN NEUHAUSER LANDFILL SITE

March 2, 2018

This plan is being submitted by Geosyntec Consultants, Inc. (Geosyntec) pursuant to the February 28, 2018 request by Joyce Ackerman the US Environmental Protection Agency (EPA) On Scene Coordinator. Geosyntec has prepared this document to provide the EPA with a proposed interim shut down plan for the above site, where time-critical removal of buried drums, contaminated soil, and black sludge are being conducted pursuant to that certain Administrative Settlement Agreement and Order on Consent for Removal Actions CERCLA Docket No. CERCLA-08-2018-002(AOC). The EPA approved Drum Removal Work Plan (DRWP) requires excavation of highly contaminated soils, including soils exceeding 100 ppm screening level as measured by a Photo Ionization Detector (PID). Currently, we believe that the drums and black sludge described in the AOC have been removed and properly transported to an EPA approved offsite disposal facility or will be within the next week. Additional soils remain on the site (approximately 700 tons of Phase 2B soil in roll-offs, approximately 1100 cu.yds in stockpiles from Phase 2B, and approximately 3500 to 4000 cu.yds in stockpiles from Phase 1) for which disposal and onsite treatment/management options are currently being assessed. We estimate that several thousand yards of residual soils still remain within the excavations that exceed the 100 ppm criteria, based on test pit data. We are currently assessing options for onsite treatment and management options for these soils because excavation and offsite disposal of all these soils is not financially feasible, nor is it likely to be the most cost-effective alternative. In consideration of these issues, and to allow time to evaluate and discuss alternative approaches with EPA and the Colorado Department of Public Health and Environment CDPHE), we are proposing a temporary shutdown of Site activities which shutdown is contemplated to be approximately three months. The proposed interim shutdown actions presented below are intended to assure site security and protection of human health and the environment during the shutdown.

Rolloffs and Frac Tank

Disposal options for soil currently in rolloffs are being evaluated; soils approved for disposal at the Front Range Landfill will be disposed as soon as practicable. The Frac Tank liquids will be removed and properly disposed offsite as necessary to maintain capacity.

Lining Excavation Areas

The Phase 2A, 2B and 3 excavations will be lined with a Woven Coated PE liner by Hanes Geocomponents, or a similar LDPE liner depending on availability, anchored in 1-foot deep trenches along the top perimeter. The liners will be setup to collect run off water and precipitation. These areas will be periodically checked and pumped out as necessary to assure the fluids do not release from the lined area. The fluids removed from the lined areas will be transferred to the onsite Frac tank for storage and subsequent sampling and disposal. The

attached figures show the plan and section views of the excavations based on surveying conducted on February 17, 2018. Updated surveying was conducted on March 2 and will the results will be provided as soon as available.

Protection of Stockpiles and Phase 1 Excavation

We anticipate collecting additional samples of the Phase 1 soil (stockpile and excavation) to confirm that concentrations of volatile compounds of concern are at levels that will allow placement of the stockpiled soils back in the excavation, if approved by EPA and CDPHE. Otherwise, the Phase 1 excavation and stockpiles of the impacted soils from Phase 1, as well as the stockpiles Phase 2B soils, will be covered with a Flexterra, a flexible water retaining temporary cover that is placed with a hydro seeder. The stockpiled areas can be covered over an approximate 2-day period and the covers are expected to last beyond the planned shutdown but will be re-applied if necessary.

Air Monitoring

Ambient air monitoring will be conducted in general accordance with Section 2 of the Ambient Air Monitoring Plan (AAMP) and continue for at least 2 weeks beyond the installation of the liners in the excavations and flexible covers on the stockpiles. This will include the collection of canister samples at the site perimeter as required by the AAMP. Site specific real time monitoring will only be conducted at the excavation locations as needed for installation of liners. Air monitoring will cease after 2 weeks if no ambient air impacts due to emissions from the work area are detected, if approved by EPA and CDPHE.

Site Monitoring, Repairs, and Reporting

The site will be checked several times per week and daily if warranted and will include visual assessment of the liners and covers, pumping water from the lined areas as necessary, and inspecting the security of the site trailer and equipment. Any damage to liners and covers will be reported to EPA within 24 hours and repaired promptly. Daily logs documenting site conditions will be submitted to EPA.

Schedule

The liner for the Phase 2A excavation has already been installed. The liners for the Phase 2B and 3 excavations will be ordered upon EPA approval of this plan and are expected to be installed in approximately 2 to 3 weeks. Spray-on cover application is tentatively scheduled for next week, pending EPA approval of this plan.

Attachments:

Figure 1 – Proposed Interim Shut Down, Phase 1 – Plan View

Figure 2 – Proposed Interim Shut Down, Phase 1 – Profiles 1-XS1 and 1-XS2

Figure 3 – Proposed Interim Shut Down, Phase 2A, 2B, and 3 – Plan View

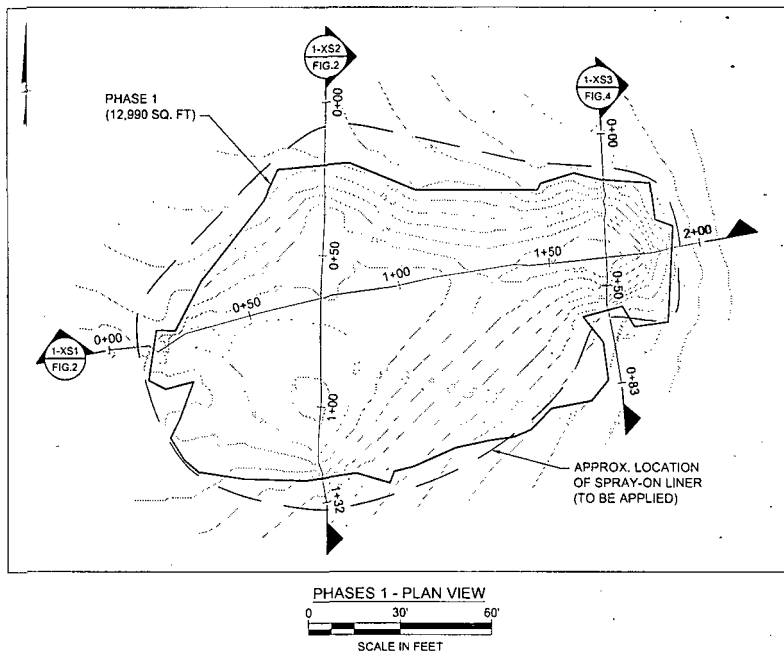
Figure 4 – Proposed Interim Shut Down, Phase 2A, 2B, and 3 – Phase 1 and 2A Profiles 1-XS3,
2A-XS1 and 2A-XS2

Figure 5 – Proposed Interim Shut Down, Phase 2B Profile 2B-XS1

Figure 6 – Proposed Interim Shut Down, Phase 2B Profiles 2B-XS2 and 2B-XS3

Figure 7 – Proposed Interim Shut Down, Phase 3 Profiles 3-XS1 and 3-XS2

Figure 8 – Limits Phases 1, 2A, 2B and 3 – Plan View



- NOTES:**
1. INFORMATION IS BASED ON SURVEY COMPLETED BY CWC ON 2-17-2018.
 2. LINER TO BE ANCHORED INTO 1' DEEP TRENCH AROUND PERIMETER AND PLACED TO ALLOW FOR A SUMP AREA FOR PUMPING OF SURFACE WATER INTO THE FRAC TANK AS NEEDED.

NEUHAUSER LANDFILL SITE

PROPOSED INTERIM SHUT DOWN
PHASE 1 - PLAN VIEW

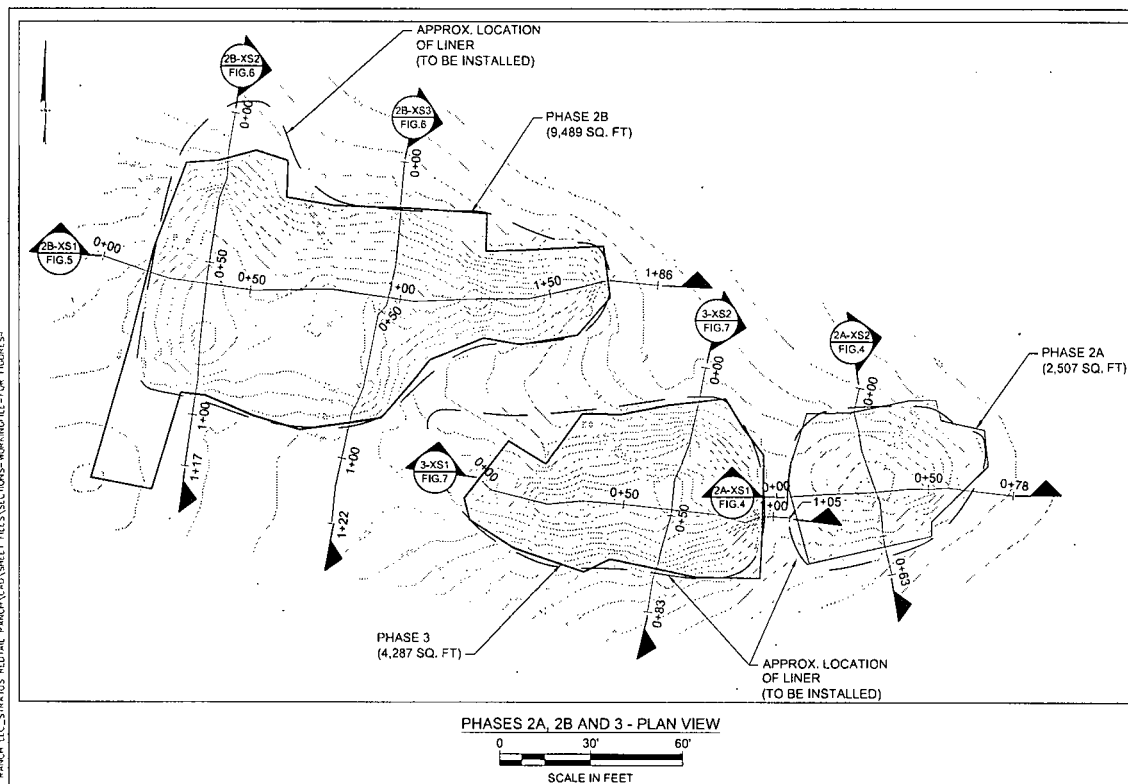
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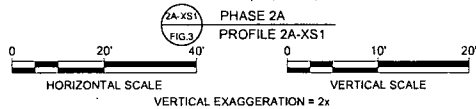
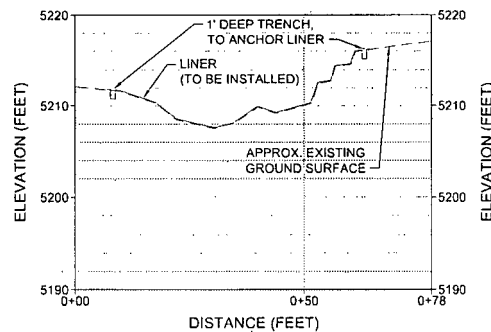
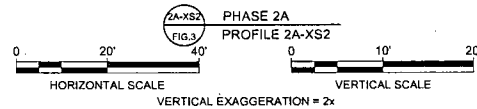
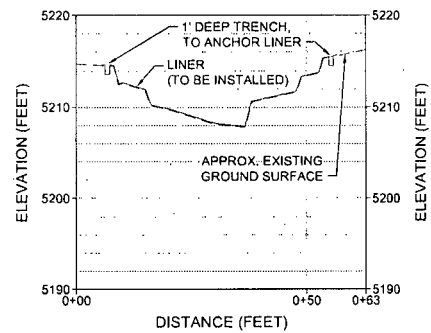
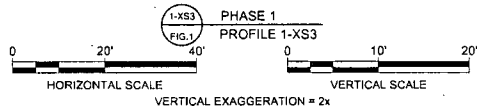
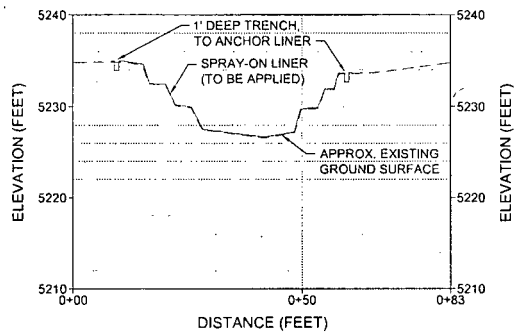
MARCH 2018

FIGURE

1



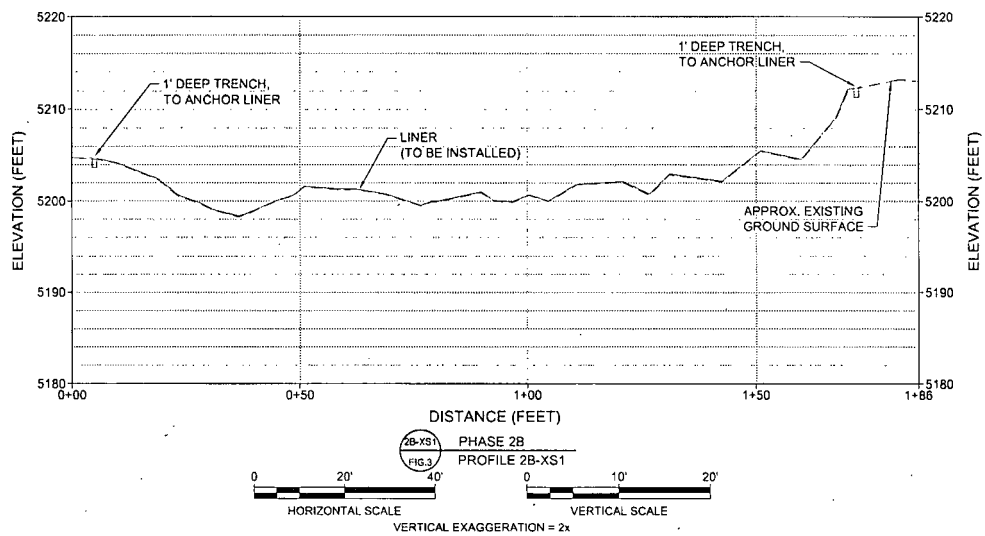
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NOTE:
1. INFORMATION IS BASED ON SURVEY COMPLETED
BY CWC ON 2-17-2018.

NEUHAUSER LANDFILL SITE	
PROPOSED INTERIM SHUT DOWN PHASE 1 AND 2A PROFILES 1-XS3, 2A-XS1 AND 2A-XS2	
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FIGURE 4	

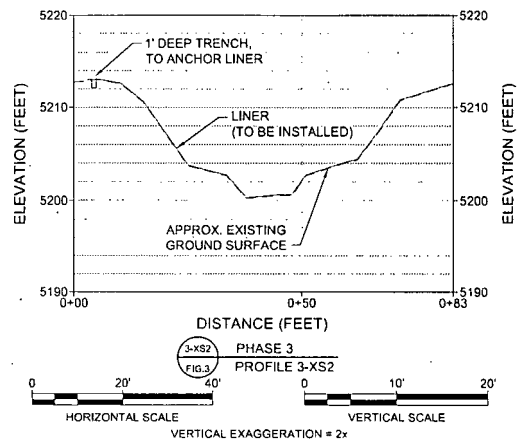
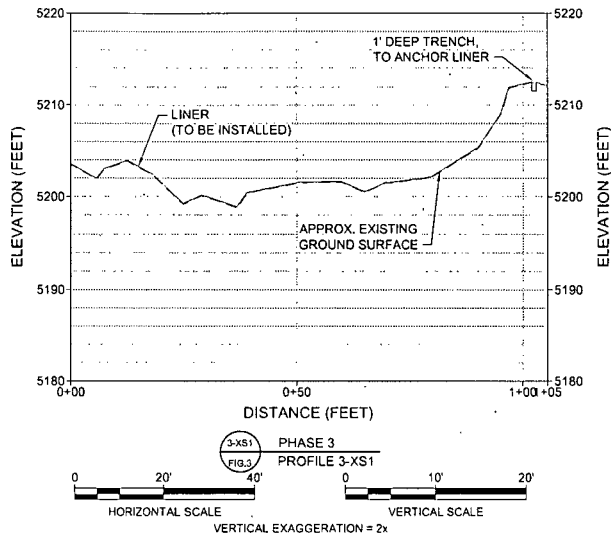
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NOTE:
1. INFORMATION IS BASED ON SURVEY COMPLETED
BY CWC ON 2-17-2018.

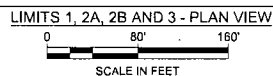
NEUHAUSER LANDFILL SITE	
PROPOSED INTERIM SHUT DOWN PHASE 2B PROFILE 2B-XS1	
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NOTE:
1. INFORMATION IS BASED ON SURVEY COMPLETED
BY CWC ON 2-17-2018.

NEUHAUSER LANDFILL SITE	
PROPOSED INTERIM SHUT DOWN PHASE 3 PROFILES 3-XS1 AND 3-XS2	
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0 80' 160'

SCALE IN FEET

NEUHAUSER LANDFILL SITE

LIMITS 1, 2A, 2B AND 3 - PLAN VIEW

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FIGURE

8

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